



ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

DOCKET FILE COPY ORIGINAL

RECEIVED

JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 17, 2000


Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Numbering Resource Optimization, CC Docket No. 99-200

Dear Ms. Salas:

Please find attached an original and four copies of the Petition for Reconsideration and Clarification by the Association for Local Telecommunications Services with regard to the Commission's Report and Order in the above-referenced proceeding.

Sincerely,



Teresa K. Gaugler

cc: ITS, Inc.
Charles L. Keller
Diane Harmon
Jeannie Grimes

No. of Copies rec'd 0+5
List ABCDE

**Before the
Federal Communications Commission
Washington, D.C.**

RECEIVED

JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Numbering Resources Optimization

)
)
)
)
)

CC Docket No. 99-200

**PETITION FOR RECONSIDERATION AND CLARIFICATION BY
THE ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES**

The Association for Local Telecommunications Services ("ALTS") hereby files its petition for reconsideration and clarification of the Federal Communications Commission's ("FCC" or "Commission") *Report and Order* released on March 31, 2000 in the above-captioned proceeding.¹ ALTS is the leading national trade association representing facilities-based competitive local exchange carriers ("CLECs").

I. INTRODUCTION

ALTS welcomes the decisions in the *Report and Order* that further national number optimization efforts through the institution of nationwide thousands block pooling, and more effective national administrative guidelines. Generally, these measures provide a firm foundation for more efficient use of the numbering resource. This hopefully will result in an easing of the numbering crisis, thereby allowing the

¹ *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 00-104 (rel. March 31, 2000) ("*Report and Order*").

competitive local exchange market to continue to introduce new services and technologies without being chilled by a lack of available numbering resources.

Some aspects of the decision, however, should be reconsidered or clarified in order to ensure that all of the new measures produce the maximum optimization without compromising the Commission's commitment to competitively neutral number administration. Specifically, ALTS asks the Commission *herein* to reconsider or clarify certain aspects of its decisions with respect to: (1) service activation deadlines; (2) utilization thresholds; (3) intermediate numbers definition; (4) number reservation policy; (5) five-day limit on pending status; and (6) directives to states regarding the establishment of additional state pooling trials.

II. SERVICE ACTIVATION DEADLINES

In the *Report and Order*, the Commission adopted its tentative conclusion to require the initiation of reclamation action within sixty days of expiration of the assignee's applicable activation deadline, instead of the current 18-month timeframe in the CO Code Assignment Guidelines.² ALTS appreciates the Commission's attempt to limit the length of time an NXX code may be left idle, thereby increasing the availability of numbers. Indeed, ALTS supports the reduction to a sixty-day period before reclamation action begins with regard to assignments of growth codes.

However, while the reduction to sixty days may be appropriate for the activation of growth codes, ALTS urges the Commission to reconsider the impact such a change will have when initial NXX codes are being activated. Once a carrier has established

² *Report and Order* ¶ 241.

service in a rate center, and is in a position to require additional or growth NXX codes, the carrier necessarily has all the facilities and interconnection arrangements in place it needs to activate the code promptly upon assignment. Most wireless carriers and virtually all incumbent local exchange carriers ("ILECs"), with their broad based, embedded facilities in place, enjoy this advantage.

Conversely, when a new carrier is establishing service in a rate area and requesting an NXX code for the first time, the carrier is often the victim of unavoidable delays in being able to place the code in service. Frequently, new entrants are at the mercy of the incumbents for trunks, access tandems, and other essential provisioning necessary to begin service to end-users.³ Through no fault of the CLEC, delays are often encountered that preclude meeting a sixty-day time limit. The Commission recognized this very problem in the *Report and Order* when it noted, "New entrants, in particular, may suffer unexpected delays or scheduling setbacks beyond their control, which could lead to code activation delays."⁴

It can be expected that virtually all delays experienced by a carrier will eventually be resolved – after all, a new carrier has every incentive to put a code in service as soon as possible so that it can begin offering service and earning a return on its substantial investment. Allowing reclamation of an initial code before a carrier has the opportunity to resolve the delay will only force the carrier to reinitiate the code request process, adding to the already-experienced delays, and unnecessarily increasing carrier

³ Even though a carrier may have all of its trunking and other interconnection arrangements in place by the applicable activation deadline, the carrier will often need additional facilities to provide service once an order is received in the new rate area. These facilities are often available only from the ILEC, and can take longer than 60 days to receive. See footnote 24, *infra*.

⁴ *Report and Order* ¶ 239.

and NANPA administrative costs. This can have substantial adverse consequences if the reclaimed code is a carrier's first code in a LATA, and the carrier used the code to establish its Location Routing Number ("LRN"). A LRN is associated with all of a carrier's facilities and switches, and is broadcast via the Number Portability Administration Center to all carriers. The process of taking a LRN out of the network, only to be re-established once the carrier reinitiates its code request, is completely unnecessary and wasteful, and carries the risk of misrouting calls and other network errors. Furthermore, premature reclamation of an initial code may result in situations in which CLECs provide prospective customers with telephone numbers that are subsequently subject to reclamation. Forced to give up their new numbers, customers will be inconvenienced and possibly lost by the CLEC. Yet despite these competitive harms, the availability of numbers will not ultimately be increased because the initial code will still be required by the CLEC even after it has been lost to premature reclamation.

Obviously, CLECs are especially adversely affected by too drastic a reduction in allowable activation intervals for initial codes, because it comes at the critical point of market entry. There is no comparable negative impact on ILEC competitors, since they have almost no need for initial codes, and in any event have virtually ubiquitous deployment of the facilities and infrastructure necessary for immediate activation of initial codes. This type of disproportionate impact is directly contrary to the FCC's stated policy of "ensur[ing] that no class of carrier or consumer is unduly favored or disfavored by our optimization efforts."⁵ In consideration of this, ALTS asks the

⁵ *Id.* ¶ 3.

Commission to modify its decision such that initiation of reclamation action for initial codes would begin no sooner than 120 days after the assignee's applicable activation deadline. Allowing 120 days before reclamation action for initial codes would still provide significant optimization improvement over the current 18-month period, but would recognize that carriers activating initial codes experience more difficulties and delays than carriers activating growth codes.⁶

III. UTILIZATION THRESHOLDS

In its comments on the *Further Notice of Proposed Rulemaking* in this proceeding, ALTS addressed some of the issues surrounding the calculation of utilization thresholds, and the importance of ensuring that a threshold is a fair and accurate portrayal of a carrier's need for numbers.⁷ ALTS raises these issues now as matters for reconsideration or clarification.

First, the FCC should reconsider its decision to include only *assigned numbers*, as newly defined in the *Report and Order*, in the calculation of a carrier's utilization level. The Commission determined that the utilization level was to be calculated by dividing all *assigned numbers* (numerator) by total numbering resources assigned to the carrier (denominator), and multiplying the results by 100.⁸ By definition, *assigned*

⁶ Alternatively, if the timeframe for reclamation of initial codes remains at 60 days after the activation deadline, carriers should have the opportunity to explain the reasons for delay and expectations for resolution, and be granted an additional 60-day extension. This process would add unnecessary administrative burden compared to establishing a 120 deadline, but would at least afford new entrants the opportunity to avoid going through the loss of needed codes and the ensuing reapplication process.

⁷ See, e.g., Comments of Association of Local Telecommunications Services to the Further Notice of Proposed Rulemaking, CC Docket 99-200, filed May 19, 2000, at 2-7.

⁸ *Report and Order* ¶ 109.

numbers excludes several categories of numbers that, while not “assigned” according to the FCC’s new definition, are nevertheless in use and unavailable for assignment to any other customer. A utilization level that excludes such numbers doesn’t accurately portray the degree to which a carrier is utilizing its number resources, and therefore cannot accurately portray the carrier’s need for additional resources.

Numbers that are improperly excluded from the utilization level calculation include *reserved*, *aging*, *administrative*, and *intermediate numbers*. All of these number categories represent numbers that are in use for legitimate and necessary purposes, and are unavailable to a carrier for assignment for any other purpose.⁹ Indeed, the Commission recognized this when it explicitly clarified that *available numbers* would be calculated by subtracting the sum of numbers in the *assigned*, *reserved*, *intermediate*, *aged* and *administrative* categories from the total of numbers in the code holder’s inventory.¹⁰ In other words, all of those number categories constitute unavailable numbers.

The purpose of a utilization threshold is for a carrier to demonstrate the degree to which the numbers assigned to it are in use, thereby justifying its need for additional numbering resources. A carrier cannot serve a new customer with a number that is reserved for another customer, or a soft dial tone number, or an employee/official number – these numbers are just as unavailable to a new customer as a number already serving another end user customer. Logically and fairly, all unavailable

⁹ For example, *aging numbers* are defined as “disconnected numbers that are not available for assignment to another end user or customer.” *Id.* ¶ 29. *Administrative numbers* are used to perform administrative or operational functions “necessary to maintain reasonable quality of service standards.” *Id.* ¶ 32.

¹⁰ *Id.* ¶ 35.

numbers should be included in the calculation of a carrier's utilization level.

Alternatively, as many commenters pointed out in their comments to the *Further Notice of Proposed Rulemaking*, the utilization threshold can be set artificially low to compensate. It makes much more sense, though, to determine accurately the portion of a carrier's number inventory that is in use so that the carrier's need for additional resources can be properly evaluated.

In addition, the Commission should clarify that utilization rates will not be the only criterion of a verification of needs test. Carriers must be allowed to obtain additional numbering resources upon demonstration of genuine need, even in circumstances where the relevant utilization threshold is not met. Such demonstrations would include, for example, verifiable but previously unanticipated increases in customer demand, proof of a customer order, planned roll-out of a new product or service that requires numbering resources, or documentation of end user or service provider equipment limitations that make additional resources necessary. Such an option is especially important to new and smaller carriers, who do not have extensive inventories from which to draw resources to meet unanticipated needs. Thus, a secondary opportunity to justify need is necessary to ensure that these carriers are not competitively disadvantaged by an inflexible numeric indicator.

Finally, ALTS asks the Commission to clarify that utilization thresholds will only be calculated on a rate center basis, and never on a NPA-wide or nationwide basis, for as long as numbers are assigned at the rate center level. The *Report and Order* is unclear as to whether the formula for calculating utilization levels would be applied to utilization at the rate center level. The rule adopted for calculating utilization levels does

not specify whether the inventory to be counted is a carrier's rate center, NPA, or nationwide inventory.¹¹ Further, the *FNPRM* suggests that a nationwide utilization threshold for growth numbering resources should be set.¹² On the other hand, the *FNPRM* proposes additionally to require carriers to meet a specific rate center-based utilization threshold for the rate center in which it is seeking additional numbering resources.¹³

Whatever the correct interpretation of the *Report and Order*, ALTS submits that the only fair and appropriate factor to use in determining the merits of a carrier's request for additional numbers in a rate center is the carrier's utilization level in that rate center. A carrier may only use numbering resources in the rate center for which the resources were requested and assigned. The fact that a carrier may have available resources in one rate center is irrelevant to the carrier's request for growth numbers in another rate center because the unused numbers are not available for use in the rate center in which the carrier has insufficient numbers. As the Commission is well aware, demand characteristics vary widely among different rate centers, NPAs, and states. Requiring carriers to aggregate utilization data from multiple areas in order to justify the need for resources in a particular rate center could lead to severe limitations on a nationwide carrier's ability to obtain necessary numbering resources, and serve as a disincentive for carriers considering service to smaller population areas or residential customers.

¹¹ Section 52.15 (g)(3)(ii) provides in part: "The numbering resource level shall be calculated by dividing all *assigned numbers* by the total numbering resources in the applicant's inventory and multiplying the result by 100." 47 C.F.R. § 52.15 (g)(3)(ii).

¹² *Report and Order* ¶ 248.

¹³ *Id.*

These minor modifications to the Commission's utilization threshold rules – use of all unavailable numbers in the calculation formula, provision for proof of need where a threshold is not met, and clarification that levels are to be calculated on a rate center basis – will result in a more accurate indicator of a carrier's need. In addition, with these changes, use of a utilization threshold will further the Commission's number optimization goals without unduly compromising carriers' legitimate needs for numbering resources in a dynamic marketplace.

IV. INTERMEDIATE NUMBERS DEFINITION

The Commission established *intermediate numbers* as new category of numbers broadly defined as “numbers that are made available for use by another carrier or non-carrier entity for the purpose of providing telecommunications service to an end user or customer.”¹⁴ In addition to creating the new category, reporting obligations associated with the category were added. A carrier providing intermediate numbers to customers must obtain utilization and forecasting data for these numbers from the customer and report it to NANPA.¹⁵ If a carrier is unable to obtain utilization data from its customer on a regular basis and incorporate the data into the carrier's utilization threshold calculations, the numbers will not count as “assigned” for purposes of calculating the carrier's utilization level.¹⁶

The definition of *intermediate numbers* is overly broad to the extent it appears to include virtually all assignments to large customer entities that manage their number

¹⁴ *Id.* ¶ 21.

¹⁵ *Id.* ¶ 40.

¹⁶ *Id.* ¶ 21. ALTS is seeking reconsideration of this exclusion in Section III, *infra*.

assignments in the course of their internal business practices.¹⁷ It is a common business practice when serving certain types of high volume customers to assign large blocks of numbers, or even entire NXX codes, for the customer to manage and assign as needed. Examples of these types of customers include hospitals, universities, businesses with large campuses, state and federal governments, and Internet Service Providers. When a carrier makes an assignment to one of these customers, the numbers are assigned from the carrier's perspective – the carrier no longer maintains those numbers in its inventory of available numbers. The carrier has no visibility to whether any individual number within the assignment is serving an end user at a given point in time. The numbers are not held in any sort of “intermediate” inventory from which the carrier may make alternate assignments. In short, the carrier has no visibility to or control over many assignments that would fall in the *intermediate number* category.

The application of new reporting obligations to this category is highly problematic. Carriers have never before had reason to request or require utilization and forecasting data from customers, and customer contracts do not contain requirements that customers provide such data. Yet now a carrier's ability to obtain additional growth codes may depend on receiving such data from its large customers. Lacking the data, a carrier may be unable to show sufficient utilization levels, even though the carrier may have no additional numbers to assign to new customers.

¹⁷ The *Report and Order* specifies numbers provided for use by resellers, numbers in dealer numbering pools, numbers preprogrammed into customer premises equipment, and numbers assigned to unified messaging service providers as examples of intermediate numbers. However, the FCC broadened the scope to include “*all* numbers controlled or made available to an end user customer by a carrier or non-carrier entity other than the code or block holder.” *Report and Order* ¶ 21 (emphasis added).

It is not apparent from a reading of the *Report and Order* that the Commission contemplated, or intended, such broad ramifications from its creation and definition of the *intermediate numbers* category. If the Commission did not intend for the category to encompass such a wide range of high volume carrier number assignments, then the definition should be clarified and narrowed. However, if the Commission does indeed intend for the category to encompass a wide range of high volume carrier number assignments, beyond dealer numbering pools and numbers preprogrammed into customer premises equipment,¹⁸ then further evaluation and analysis of the reporting and utilization impacts is called for before the definition becomes effective.

ALTS recommends that the Commission first clarify the intended scope of the *intermediate numbers* definition, and limit the definition at present to include only numbers in dealer numbering pools and numbers preprogrammed into customer premises equipment. The Commission may also want to ask the North American Numbering Council (NANC) to consider impacts and make recommendations for whether and how the category should be broadened to include other types of high volume customer number applications.

V. NUMBER RESERVATION POLICY

The *Report and Order* includes a drastic reduction in the time a number may be held in reserved status for customers, from the current practice of no time limit, to 45

¹⁸ To the extent the definition applies to numbers in dealer numbering pools and numbers preprogrammed into customer premises equipment, the category and associated reporting obligations are more understandable and workable. However, lacking any clear definition of "unified messaging service" providers, or delineation between these and other high volume customers, there is no way to understand and apply the new rules.

days with no extensions.¹⁹ ALTS agreed with the need to have time limits on number reservations, and supported industry numbering group efforts to develop a proposal to tighten requirements and limit time periods for number reservations. But while number reservations should not be used by carriers to build excessive inventories or maintained for customers who have no realistic intention of using them, certain customers have legitimate needs for reservations that cannot be met with a 45-day reservation period. The Commission stated that limiting reservations to 45 days “balances the needs of carriers...against the objective of improving the efficiency of numbering resource use.”²⁰ Unfortunately, the needs of the end user customers were not balanced in this equation. Large users and institutions, such as government and university users, depend on access to blocks of reserved numbers to meet complex telecommunications needs. The sudden loss of these reservations, without a mechanism in place for reservation extensions, may cause irreparable harm to customers. ALTS recently joined several carriers in asking the Commission for a stay of the provision in the *Report and Order* that limits to 45 days the period for which telephone numbers can be reserved for designated customer assignment, in order to allow the Commission to fully consider the forthcoming recommendations of the NANC relating to the imposition of fees for extensions of the reserve period.²¹ ALTS reiterates those arguments here, and asks the Commission to reconsider putting drastic reservation period limits in place until a mechanism for extensions (e.g., a fee structure) is also in place. Such a delay will protect customers from unnecessary disruption of important business arrangements

¹⁹ *Report and Order* ¶¶ 23-24.

²⁰ *Id.* ¶ 23.

without in any way diminishing other number optimization efforts that are ready to be put in place.²²

VI. FIVE-DAY LIMIT ON PENDING STATUS

The Commission adopted a five-day limit on the time a number may be held in pending status in the *assigned* category.²³ The Commission reasoned that carriers could categorize numbers in the *reserved* category if they foresaw the need for more than five days before activating a number. This decision fails to take into account the unique problems new entrants face in initiating service to a customer, and as a result puts CLECs at a competitive disadvantage.

A telephone number is assigned to a customer as part of the process of taking the order for service – the telephone number is the identifier for the order, and an order must have a number in order to be processed to completion. For a carrier with ubiquitous facilities and rights-of-way to virtually all customers, there is a reasonable expectation that an order will be completed and service begun to the customer within just a few days. However, for new entrants, facilities to individual customers are not necessarily in place at the time an order for service has been received. The suggestion that orders pending longer than five days can go into reserved status is highly

²¹ See Emergency Petition for Partial Stay of the *Report and Order* by SBC Communications, ALTS, and NEXTLINK Communications, CC Docket No. 99-200, filed July 7, 2000.

²² CLECs may be disproportionately impacted by the new reservation limit because customers may be induced to remain with the incumbent provider in order to have access to desirable numbers in the incumbent's inventory. Under current reservation practices, customers can reserve desired numbers and port them when they take their service to a new carrier. With their numbers no longer on reserve, customers are unable to port numbers they may wish for future expansion (e.g., numbers in the same NXX as their current service), and may have no choice but to remain with the ILEC, since the desired numbers will only be available in the ILEC's inventory.

²³ *Report and Order* ¶ 19.

impractical from an administrative standpoint,²⁴ and in any event would not allow sufficient time in many cases for orders to be completed before expiration of the reserved period. Frequently a CLEC will have to build out additional facilities, or more likely, obtain facilities from an outside vendor (such as the ILEC), in order to complete service to a new customer. This process can certainly take more than five days, and often more than the 45 days allowed under the Commission's new reservation limit.²⁵

Although ILECs also have orders "held" for various reasons, the problems are especially acute for CLECs because of the frequency and severity of the problems delaying completion of customer orders. Drastic restriction of the amount of time a number can be held as pending, and the consequent need to create number reservations for a large portion of CLEC customer orders, will add more layers of administrative burden to the already difficult process of completing customer orders. And while making matters worse for the new carrier, such a restriction adds almost no improvement in number optimization, since the numbers are eventually put into active service for the customer.

ALTS agrees that some limit on the amount of time a number may be held as pending assignment may be useful in preventing misuse of this category, but asks that

²⁴ Carrier systems are not developed to convert numbers in pending orders to reserved number status. Compliance would require, at a minimum, daily review of all numbers pending completion and manual conversions to reserved number status. It is unknown at this time what additional efforts would be required to handle orders that require more than 5 days in pending plus 45 days in reserved, or how frequent changes will be tracked for utilization reporting purposes.

²⁵ To give just one recent example, an ALTS member has a customer order pending, with a telephone number assigned to the customer in the carrier's order systems. The service cannot be completed until facilities are provided by the ILEC, but the ILEC has given October 27, 2000 as the Firm Order Completion ("FOC") date. Under the new rules, the carrier would have to cancel and reissue the order repeatedly throughout the months of waiting for the ILEC facilities in order to maintain the integrity of the order in its systems.

a limit of at least 90 days be allowed, so that customer orders can be processed to completion with a minimum of additional administrative burden.

VII. DIRECTIVES TO STATES REGARDING POOLING TRIALS

The Commission recognized that states may continue to petition for delegations of authority to implement thousands-block number pooling in advance of national number pooling roll-out, and the *Report and Order* provides additional criteria that states must demonstrate in their petitions in order to be granted. Among the criteria is a showing that the NPA in question has a remaining life span of at least a year.²⁶ ALTS members are firm supporters of number pooling, and do not oppose additional state delegations to implement number pooling in advance of the national number pooling roll-out schedule. However, the Commission should clarify that the calculation of life span of an NPA must be based on the natural life span of an NPA, and not an artificial life span lengthened by lottery. Clearly, an NPA with, for example, only 40 remaining NXX codes would not be appropriate for pooling simply because a 3-codes-per-month lottery gives the NPA an artificial life span of more than a year. In order to establish effective number pooling, there needs to be sufficient codes to supply both pooling and non-pooling carriers with numbers. The Commission correctly recognized this in establishing the one-year criteria. However, in order to be meaningful, the Commission should clarify that the one-year must be calculated based on the “true” life of the NPA, *i.e.*, the time the NPA is expected to last under current actual carrier demand for NXX codes, not the life of the NPA as artificially lengthened under a lottery.

²⁶

Id. ¶ 170.

VII. CONCLUSION

For the foregoing reasons, ALTS asks the Commission to reconsider or clarify certain aspects of its decisions with respect to: (1) service activation deadlines; (2) utilization thresholds; (3) intermediate numbers definition; (4) number reservation policy; (5) five-day limit on pending status; and (6) directives to states regarding the establishment of additional state pooling trials. Reconsideration and clarification is necessary to ensure that all of the new measures produce the maximum optimization without compromising the Commission's commitment to competitively neutral number administration.

Respectfully submitted

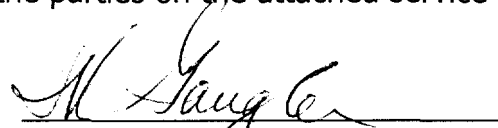
By: 

Teresa K. Gaugler
Jonathan M. Askin
Association for Local Telecommunication Services
888 17th Street, N.W., Suite 900
Washington, D.C. 20006
202.969.2587
202.969.2581 fax

July 17, 2000

CERTIFICATE OF SERVICE

I, Teresa K. Gaugler, do hereby certify that on this 17th day of July, 2000, copies of the foregoing Petition for Reconsideration and Clarification by the Association for Local Telecommunications Services were served via first class mail, postage prepaid, or by hand delivery to the parties on the attached service list.

A handwritten signature in dark ink, appearing to read 'T. Gaugler', is written over a horizontal line.

Teresa K. Gaugler
Association for Local
Telecommunications Services

Service List 99-200

**LAWERENCE MALONE
GENERAL COUNSEL
PUBLIC SERVICE COMMISSION OF THE STATE OF
NEW YORK
THREE EMPIRE STATE PLAZA
ALBANY, NY 12223-1350**

**JAMES S. BLASZAK
LEVIEN BLASAK BLOCK & BOOTHBY LLP
COUNSEL FOR AD HOC TELECOMMUNICATIONS
USERS COMMITTEE
2001 L STREET NW
SUITE 900
WASHINGTON, DC 20036**

**CHARLES D. COSSON
AIRTOUCH COMMUNICATIONS
ONE CALIFORNIA STREET 29TH FLOOR
SAN FRANCISCO, CA 94111**

**PEGGY ARVANITAS
620 BYPASS DRIVE
CLEARWATER FL 33764**

**KATHRYN MARIE KRAUSE
ROBERT MCKENNA
JAMES T. HANNON
DAN L. POOLE
US WEST COMMUNICATIONS, INC
1020 19TH STREET NW SUITE 700
WASHINGTON, DC 20036**

**JOHNATHAN ASKIN
ASSOCIATION FOR LOCAL TELECOMMUNICATIONS
SERVICES
888 17TH STREET NW SUITE 900
WASHINGTON,DC 20006**

**W. MARK ADAMS ESQ.
EXECUTIVE DIRECTOR
NATIONAL EMERGENCY NUMBER ASSOCIATION
491 CHESHIRE ROAD
SUNBURY, OH 43074**

**MARK C. ROSENBLUM
ROY E. HOFFINGER
JAMES H. BOLIN JR.
AT&T CORPORATION
295 NORTH MAPLE AVE
ROOM 1130M1
BASKING RIDGE, NJ 07920**

Service List 99-200

**JOHNATHAN CHAMBERS
VICE PRESIDENT-FEDERAL REGULATORY AFFAIRS
SPRINT CORPORATION
1801 K STREET NW SUITE M112
WASHINGTON, DC 20006**

**JOHN M. GOODMAN
BELL ATLANTIC
1300 I STREET NW
SUITE 400 WEST
WASHINGTON, DC 20005**

**M. ROBERT SUTHERLAND
THEODORE R. KINGSLEY
BELL SOUTH CORPORATION
1155 PEACHTREE STREET NE SUITE 1700
ATLANTA, GA 30309-3610**

**HUGH BURROWS
BURROWS RESEARCH GROUP
PO BOX 5000
LANARK ONTARIO
CANADA K0G1K0**

**DAVID ELLEN
CABLE VISION LIGHTPATH INC
111 STEWART AVE
BETHPAGE NY 11714**

**PETER ARTH JR
LIONEL WILSON
HELEN M. MICKIEWICZ
STATE OF CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102**

**WILLIAM CAMPBELL
STATE ASSEMBLYMAN
PO BOX 942849
SACRAMENTO, CA 94249-0001**

**DOUGLAS CARSON
PO BOX 12574
BERKELEY, CA 94712**

Service List 99-200

**RANDALL COLEMAN
LOLITA D. SMITH
CELLULAR TELECOMMUNICATIONS INDUSTRY
ASSOCIATION
1250 CONNECTICUT AVE NW SUITE 800
WASHINGTON, DC 20036**

**CHERIE R. KISER
GIL M. STROBLE
FRANK W. LLOYD
DONNA N. LAMPERT
HOWARD J SYMONS
SARA F. SEIDMAN
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO,
PC
701 PENNSYLVANIA AVE NW SUITE 900
WASHINGTON, DC 20004**

**DAVID L. MEIER
CINCINNATI BELL TELEPHONE COMPANY
201 E FOURTH STREET
CINCINNATI, OH 45201-2301**

**ROBERT KELTER
J SEAMUS GYNN
CITIZENS UTILITY BOARD OF ILLINOIS
208 S. LASALLE, SUITE 1760
CHICAGO, IL 60604**

**MARSHA N COHEN
2201 LYON STREET
SAN FRANCISCO, CA 94115**

**LARRY BLOSSER
KEMAL HAWA
SWINDLER, BERLIN, SHEREFF, FRIEDMAN LLP
COUNSEL FOR CONNECT COMMUNICATIONS
3000 K STREET SUITE 300
WASHINGTON, DC 20007**

**REBECCA M. QUINTANA
CHAIR
COLORADO NUMBERING TASK FORCE
1580 LOGAN STREET
DENVER, CO 80203**

**RAYMOND GIFFORD
COLORADO PUBLIC UTILITIES COMMISSION
1580 LOGAN STREET
SUITE 740
DENVER, CO 80203**

Service List 99-200

**LOUISE RICKARD
ACTING EXECUTIVE SECRETARY
STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC CONTROL
10 FRANKLIN SQUARE
NEW BRITAIN, CT 06051**

**JG HARRINGTON
DOW, LOHNES & ALBERTSON PLLC
COUNSEL FOR COX COMMUNICATIONS INC
1200 NEW HAMPSHIRE AVENUE NW
SUITE 800
WASHINGTON, DC 20036**

**RICHARD EYRE
PO BOX 2408
TEMPE, AZ 85280-2480**

**CYNTHIA B. MILLER
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD
TALLAHASSEE, FL 32399-0850**

**RICHARD METZGER
MATTHEW H. BERNIS
FOCAL COMMUNICATIONS CORPORATION
200 NORTH LASALLE STREET
CHICAGO, IL 60601**

**ANDRE J. LACHANCE
GTE SERVICE CORPORATION
1850 M STREET NW SUITE 1200
WASHINGTON, DC 20036**

**ILLINOIS CHAPTER OF NATIONAL ENERGY NUMBER
ASSOCIATION
LOVES PARK 9-1-1
LOVES PARK DRIVE
LOVES PARK, IL 61111**

**CAROL SALVA
632 14TH STREET
SANTA MONICA, CA 90402**

Service List 99-200

DANA FRIX
SWINDLER, BERLIN SHREFF FRIEDMAN LLP
COUNSEL FOR CHOICE ONE COMMUNICATIONS INC
AND GST TELECOMMUNCAITONS
3000 K STREET NW , SUITE 300
WASHINGTON, DC 20007

PAUL GLIST
COLE RYWID & BRAVERMAN
1919 PENNSYLVANIA AVE NW SUITE 200
COUNSEL FOR CENTURY COMMUNCATIONS CORP
AND CENTENNIAL CELLULAR
WASHINGTON,DC 20007

SUSAM W. SMITH
DIRECTOR-EXTERNAL AFFIARS
CENTURYTEL WIRELESS INC
3505 SUMMERHILL RAOD
NO 4 SUMMER PLACE
TEXARKANA, TX 75501

MARK J. BURZYCH
ATTORNEY FOR THUMB CELLULAR LIMITED
PARTNERSHIP
FOSTER SWIFT COLLINS & SMITH PC
313 SOUTH WASHINGTON SQUARE
LANSING, MI 48933-2193

KENNETH E. HARDMAN
ATTORNEY FOR TRILLIUM CELLULAR CORP
MOIR AND HARDMAN
1828 L STREET NW
SUITE 901
WASHINGTON, DC 20036-5104

MELISSA CARO
ALBERTO LEVY PHD
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL
1701 NORTH CONGRESS AVENUE
SUITE 9-180
PO BOX 12397
AUSTIN, TX 78711-2397

RUSELL M. BLAU
MICHAEL ROMANO
JEANNE STOCKMAN
SWINDLER BERLINE SHEREFF FRIEDMAN, LLP
COUNSEL FOR RCN TELECOM SERVICES
3000 K STREET SUITE 300
WASHINGTON, DC 20007

MICHAEL R. ROMANO
SWIDLER, BERLIN SHEREFF, FRIEDMAN, LLP
COUNSEL FOR LEVEL 3 COMMUNCATIONS
3000 K STREET NW SUITE 300
WASHINGTON, DC 20007

Service List 99-200

**EDWARD A. YORKITIS, JR
KELLEY DRYE & WARREN LLP
ATTORNEYS FOR LIBERTY COMMUNICATIONS
1200 19TH STREET SUITE 500
WASHINGTON, DC 20036**

**TRINA M. BRAGDON
MAINE PUBLIC UTILITIES COMMISSION
242 STATE STREET
18 STATE HOUSE STATION
AUGUSTA, ME 04333-0018**

**THE HONORABLE JANET GAIL BESSER
CHAIR
COMMONWEALTH OF MASSACHUSETTES
DEPARTMENT OF TELECOMMUNICATIONS AND
ENERGY
ONE SOUTH STATION
2ND FLOOR
BOSTON, MA 02110**

**MARY DE LUCA
ANNA F LA LENA
MCI WORLD COMM INC
1801 PENNSYLVANIA AVE NW
WASHINGTON, DC 20006**

**SUSAN M. EID
RICHARD A. KARRE
MEDIAONE GROUP INC
1919 PENNSYLVANIA AVE NW, SUITE 610
WASHINGTON, DC 20006**

**ANN SEHA
ASSISTANT ATTORNEY GENERAL
MANAGER, PUBLIC UTILITIES DIVISION
121 7TH PLACE EAST, SUITE 350
ST. PAUL, MN 55101**

**WILLIAM K. HAAS
DAN JOYCE
MISSOURI PUBLIC SERVICE COMMISSION
ROOM 750
301 WEST HIGH STREET
JEFFERSON CITY, MO 65102**

Service List 99-200

**DR. H. GILBERT MILLER
VICE PRESIDENT
MITRETEK SYSTEMS INC
CENTER FOR TELECOMMUNICATIONS AND
ADVANCED TECHNOLOGY
7525 COLSHIRE DRIVE
MCLEAN, VA 22102**

**DON WOODFORD
MOBILITY CANADA
1420 BLAIR PLACE, SUITE 700
GLOUCESTER ONTARIO
K1J 9L8**

**CAROL ANN BISCHOFF
ROBER MCDOWELL
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION
1900 M STREET NW SUITE 800
WASHINGTON, DC 20036**

**JAMES BRADFORD RAMSAY
NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS
1101 VERMONT AVE NW SUITE 200
WASHINGTON, DC 20005**

**JOHN F. RAPOSA
GTE SERVICE CORPORATION
600 HIDDEN RIDGE, HQE03J27
PO BOX 152092
IRVING, TX 75015-2092**

**JEFFERY S. LINDER
WILEY REIN & FIELDING
ATTORNEY FOR GTE SERVICE CORPORATION
1776 K STREET NW
WASHINGTON, DC 20006**

**TINA S. PYLE
RICHARD A. KARRE
MEDIAONE GROUP, INC
1919 PENNSYLVANIA AVE NW
SUITE 610
WASHINGTON, DC 20006**

**BILL HINKLE
MARK ADAMS ESQ
NATIONAL EMERGENCY NUMBER ASSOCIATION
491 CHESHIRE ROAD
SUBURY, OH 43074**

Service List 99-200

**RICHARD A. ASKOFF
REGINA MCNEIL
NATIONAL EXCHANGE CARRIER ASSOCIATION INC
100 SOUTH JEFFERSON ROAD
WHIPPANY NJ 07981**

**NATIONAL TELEPHONE COOPERATIVE ASSOCIATION
L. MARIE GUILLORY
JAN CANFIELD
4121 WILSON BOULEVARD
TENTH FLOOR
ARLINGTON, VA 22203-1801**

**E BARCLAY JACKSON
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION
8 OLD SUN COOK ROAD
CONCORD, NH 03301**

**JOHN J. FARMER JR
NEW JERSEY BOARD OF PUBLIC UTILITIES
DIVISION OF LAW
124 HALSEY STREET
5TH FLOOR
PO BOX 45029
NEWARK, NJ 07101**

**CHERYL L. CALLAHAN
ASSISTANT COUNSEL
NEW YORK STATE PUBLIC SERVICE COMMISSION
THREE EMPIRE STATE PLAZA
ALBANY, NY 12223-1350**

**DAVID L. MARTIN
DOW LOHNES & ALBERTSON PLLC
COUNSEL FOR NEXTEL COMMUNICATIONS INC
1200 NEW HAMPSHIRE AVENUE NW SUITE 800
WASHINGTON, DC 20036**

**ROBERT FOOSANER
LAWRENCE R. KREVOR
LAURA L. HOLLOWAY
NEXTEL COMMUNICATIONS, INC
2001 EDMUND HALLEY DRIVE
RESTON, VA 20191**

**DANIEL GONZALEZ
JASON WILLIAMS
NEXTLINK COMMUNICATIONS INC
1730 RHODE ISLAND AVE NW
SUITE 1000
WASHINGTON, DC 20036**

Service List 99-200

**JANE WHANG
DAVIS WRIGHT TREMAINE LLP
COUNSEL FOR NEXTLINK COMMUNICATIONS
1155 CONNECTICUT AVE NW SUITE 700
WASHINGTON, DC 20036**

**RONALD R. CONNERS
NORTH AMERICAN NUMBERING PLAN
ADMINISTRATOR
1133 15TH STREET NW 12TH FLOOR
WASHINGTON, DC 20005**

**PROFESSOR BILL NIELL
PO BOX 33666
SAN DIEGO, CA 92163-3666**

**LES SELZER
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS BUREAU
THE PORTALS
445 12TH STREET SW
WASHINGTON, DC 20554**

**AARON GOLDBERGER
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON, DC 20554**

**RONALD BINZ
CO-CHAIRMAN
NORTH AMERICAN NUMBERING COUNCIL
COMPLETION POLICY INSTITUTE
3773 CHERRY CREEK NORTH DRIVE
SUITE 1050
DENVER, CO 80209**

**ANTOINETTE R. WIKE
CHIEF COUNSEL
NORTH CAROLINA PUBLIC UTILITY UTILITIES
COMMISSION
PO BOX 29520
RALEIGH, NC 27626-0520**

**MARK J TAUBER
MARK J O'CONNER
OMNIPONT CORPORATION
PIPER & MARBURY LLP
1200 19TH STREET NW 7TH FLOOR
WASHINGTON, DC 20036**

Service List 99-200

**JUDITH ST. LEGER-ROTY
MICHAEL B. HAZZARD
KELLY DRYE & WARREN, LLP
PAGING NETWORK, INC
1200 19TH STREET NW 5TH FLOOR
WASHINGTON, DC 20036**

**DAVID E. SCREVEM
FRANK B. WILMARTH
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265
HARRISBURG, PA 17105-3265**

**JOEL HI. CHESKIS
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET 5TH FLOOR FORUM PLACE
HARRISBURG, PA 17101**

**MERY MC DERMOTT
ROBERT L. HOGGARTH
PERSONAL COMMUNICATIONS INDUSTRY
ASSOCIATION
500 MONTGOMERY STREET , SUITE 700
ALEXANDRIA, VA 22314**

**DENNIS THRO
1226 TRINITY CHURCH ROAD
WRIGHTSBILLE, PA 17368**

**CRAIG A. GLAZER, CHAIRMAN
PUBLIC COMMISSION OF OHION
180 E. BROAD STREET
COLUMBUS , OH 43215**

**MELISSA CARA
ALBERTO LEVY Ph.D.
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL
1701 NORTH CONGRESS AVENUE
SUITE 9-180
PO BOX 12397
AUSTIN, TX 78711-2397**

**TERESA K. GAUGLER
JANE KUKA
QWEST COMMUNICATIONS CORPORATION
4250 NORTH FAIRFAX DRIVE
ARLINGTON, VA 22203**

Service List 99-200

RUSSELL BLAU
MICHAEL R. ROMANO
JEANNE W. STOCKMAN
SWIDLER, BERLIN, SHEREFF, FRIEDMAN LLP
COUNSEL FOR MFS COMMUNICATIONS GROUP INC. &
RCN TELECOM SERVICES INC
3000 K STREET NW 300
WASHINGTON, DC 20007

RICHARD EYRE
REC NETWORKS
PO BOX 2408
TEMPE, AZ 8520-2408

WILLIAM P. HUNT III
LEVEL 3 COMMUNICATIONS INC
1450 INFINITE DRIVE
LOUISVILLE, CO 80027

DAWN HUNT
ROGERS CANTEL INC
33 BLOOR STREET EAST
TORONTO ONTARIO
M4W 1G9
CANADA

THERESA FENELON FALK
PILLSBURY, MADISON & SUTRO LLP
COUNSEL FOR SACO RIVER TELEGRAPH AND
TELEPHONE COMPANY
1100 NEW YORK AVE NW
NINTH FLOOR
EAST TOWER
WASHINGTON, DC 20005

CARL K. OSHIRO
COUNSEL FOR SMALL BUSINESS ALLIANCE FOR FAIR
UTILITY REGULATION
100 FIRST STREET SITE 2540
SAN FRANCISCO, CA 94105

JAMES J. MC CULLOUGH
DENEEN J. MELANDER
ANDREW D. SKOWRONEK
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
COUNSEL FOR TELECORDIA TECHNOLOGIES INC.
1001 PENNSYLVANIA AVE NW SUITE 800
WASHINGTON, DC 20004-2505

JAY C. KEITHLEY
SPRINT CORPORATION
1850 M STREET NW
SUITE 1110
WASHINGTON, DC 20036-5807

Service List 99-200

**MICHAEL A. SULLIVAN
15 SPENCER AVENUE
SOMERVILLE, MA 02144**

**RICHARD A. MUSCAT
COUNSEL FOR TEXAS ADVISORY COMMISSION STATE
EMERGENCY COMMUNICATIONS
THE GONZA'LEZ LAW FIRM
ONE WESTLAKE PLAZA
1705 SOUTH CAPITAL OF TEXAS HIGHWAY
SUITE 100
AUSTIN, TX 78746**

**BRIAN CONROY
THOMAS A. JONES
DAVID DON
WILLKIE, FARR & GALLAGHER
COUNSEL FOR TIME WARNER TELECOM HOLDING
INC d/b/a TIME WARNER TELECOM
THREE LAFAYETTE CENTER
1155 21ST STREET NW
WASHINGTON, DC 20036**

**MELISSA CARO
ALBERTO LEVY Ph.D.
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL
1701 NORTH CONGRESS AVE
SUITE 9-180
P.O. BOX 12397
AUSTIN, TEXAS 78711-2397**

**LAWRENCE E. SARJEANT
LINDA L. KENT
KEITH TOWNSEND
JULIE L. RONES
UNITED STATES TELECOM ASSOCIATION
1401 H STREET, NW
SUITE 600
WASHINGTON, DC 20005**

**KATHARYN MARIE KRAUSE
ROBERT B. MCKENNA
DAN L. POOLE
US WEST COMMUNICATIONS, INC
1020 19TH STREET NW
SUITE 700
WASHINGTON, DC 20036**

**BRIAN O'CONNOR
VOICESTRAM WIRELESS CORPORATION
1300 PENNSYLVANIA AVE NW SUITE 700
WASHINGTON, DC 20004**

**ROBERT W. MCAUSLAND
ALLEGIANCE TELECOMM INC.
1950 STEMMONS FREEWAY
SUITE 3026 DALLAS, TX 75207**

Service List 99-200

**CLAY BAILEY
CENTURYTEL INC
100 CENTURY PARK DRIVE
MONROE, LA 71203**

**LARRY A. BLOSSER ESQ
KEMAL HAWA ESQ
SWINDLER, BERLIN, SHEREFF, FRIEDMAN, LLP
COUNSEL FOR CONNECT COMMUNICATIONS
CORPORATION
3000 K STREET NW
SUITE 300
WASHINGTON, DC 20007**

**WILLIAM IRBY
DIRECTOR
VIRGINIA STATE CORPORATION COMMISSION
BOX 1197
RICHMOND, VA 23218**

**RICHARD LEVINE
BETA SCIENTIFIC LABORATORY INC
PO BOXD 836224
RICHARDSON, TX 75083-6224**

**RICHARD A. DIVINE
DAVID L. HEATON
COOK COUNTY STATE'S ATTORNEY OFFICE
ENVIRONMENT & ENERGY DIVISION
69 WEST WASHINGTON STREET
CHICAGO, IL 60602**

**LAURENCE E. HARRIS
DAVID S. TURETSKY
TERRI B. NATOLI
TELIGENT INC
8065 LEESBURG PIKE
VIENNA, VA 22182**

**JOHN MCHUGH
STUART POLIKOFF
ORGANIZATION FOR THE PROMOTION AND
ADVANCEMENT OF SMALL TELECOMMUNICATIONS
COMPANIES
21 DUPONT CIRCLE
SUITE 700
WASHINGTON, DC 20036**

**MAGALIE ROMAN SALAS
SECRETARY
FEDERAL COMMUNICATIONS-COMMISSION
445 12TH STREET, SW
WASHINGTON, DC 20554**

Service List 99-200

**ARI FITZGERALD
LEGAL ADVISOR
OFFICE OF COMMISSIONER WILLIAM E. KENNARD
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET, SW
WASHINGTON, DC 20554**

**LAWRENCE STRICKLING
CHIEF, COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**KEVIN MARTIN
LEGAL ADVISOR
OFFICE OF COMMISSIONER HAROLD FURGHGOTT-
ROTH
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**YOG VARMA
DEPUTY CHIEF
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**MARK SCHNEIDER
OFFICE OF COMMISSIONER SUSAN NESS
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**BLAISE A. SCINTO
DEPUTY CHIEF, NETWORK SERVICES DIVISION
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW, SUITE 6-A207
WASHINGTON, DC 20554**

**AL MCCLOUD
NETWORK SERVICES DIVISION
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**DOUGLAS PRICHARD
CITY MANAGER
ROLLING HILLS ESTATES
4045 PALOS VERDES DRIVE NORTH
ROLLING HILLS ESTATES, CA 90274**

Service List 99-200

**DIANE GRIFFTH HARMON
DEPUTY CHIEF, NETWORK SERVICES DIVISION,
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON , DC 20554**

**TEJAL MEHTA
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW
WASHINGTON, DC 20554**

**THE HONORABLE JANET GAIL BESSER, CHAIR
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND
ENERGY
100 CAMBRIDGE STREET 12TH FLOOR
BOSTON , MA 02202**

**THE HONORABLE JAMES CONNELLY
COMMISSIONER
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND
ENERGY
100 CAMBRIDGE STREET 12TH FLOOR
BOSTON, MA 02202**

**THE HONORABLE W. ROBERT KEATING, COMM.
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND
ENERGY
100 CAMBRIDGE STREET, 12TH FLOOR
BOSTON, MA 02202**

**ITS
445 12TH STREET SW
WASHINGTON, DC 20554**

**MISSOURI OFFICE OF PUBLIC COUNSEL
PO BOX 7800
JEFFERSON CITY, MO 65102**

**FLORIDA OFFICE OF PUBLIC COUNSEL
C/O FLORIDA LEGISLATURE
111 WEST MADISON STREET #812
TALLAHASSEE, FL 32399**

Service List 99-200

**INDIANA OFFICE OF UTILITY CONSUMER COUNSEL
100 N. SENATE AVENUE ROOM N501
INDIANAPOLIS, IN 46204-2494**

**MARYLAND OFFICE OF PUBLIC COUNSEL
6 ST PAUL STREET SUITE 2102
BALTIMORE, MD 21202**

**THE OFFICE OF THE PEOPLE'S COUNSEL
DISTRICT OF COLUMBIA
1133 15TH STREET NW SUITE 500
WASHINGTON, DC 20005**

**CALIFORNIA OFFICE OF RATEPAYER ADVOCATES
505 VAN NESS AVENUE ROOM 4202
SAN FRANCISCO, CA 94102**

**THE UTILITY REFORM NETWORK
711 VAN NESS AVE SUITE 350
SAN FRANCISCO, CA 94102**

**MAINE PUBLIC ADVOCATE
STATE HOUSE STATION 112
AUGUSTA, MAINE 04333**

**BENJAMIN H. DICKENS JR
MIDVALE TELEPHONE EXCHANGE INC
NORTHEAST LOUISIANA TELEPHONE
INTERSTATE TELECOMMUNICATIONS CORP.
RADIO PAGING SERVICE
2120 I STREET NW
WASHINGTON, DC 20037**

**JAMES TROUP
IOWA TELECOMMUNICATIONS SERVICES
ARTER & HADDEN LLP
1800 K STREET NW SUITE 400
WASHINGTON, DC 20006**

Service List 99-200

**TEYA M. PENNIMAN
OREGON PUBLIC UTILITY COMMISSION
550 CAPITOL STREET NE
SALEM, OR 97310-1380**

**JOHN KUYKEDALL
KRANSIKIN, LESSE & COSSON, LLP
RURAL INDEPENDENT COMPETITIVE ALLIANCE
2120 L STREET NW SUITE 520
WASHINGTON, DC 20036**

**GENERAL SERVICE ADMINISTRATION
1800 F STREET NW RM 4002
WASHINGTON, DC 20405**

**JOHNATHAN E. CANIS
KELLEY DRYE & WARREN LLP
ATTORNEYS FOR 2ND CENTURY COMMUNICATIONS
1200 19TH STREET NW SUITE 500
WASHINGTON, DC 20036**

**2ND CENTURY COMMUNICATIONS INC
7702 WOODLAND CENTER BOULEVARD
SUITE 50
TAMPA, FL 33614**

**JOHN T. SCOTT, III
VICE-PRESIDENT AND DEPUTY GENERAL COUNSEL
VERIZON WIRELESS
1001 PENNSYLVANIA AVE NW
WASHINGTON, DC 20004-2595**